

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE

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In re: : Chapter 11  
:  
VIRGIN ORBIT HOLDINGS, INC., *et al.*<sup>1</sup> : Case No. 23-10405 (KBO)  
:  
Debtors. : (Jointly Administered)  
:  
:  
----- x  
:  
VLADIMIR BOYKO, on behalf of himself and:  
all others similarly situated, :  
:  
Plaintiff, : Adv. Proc. No. 23-50324-KBO  
:  
v. : **Docket Ref. No. 11**  
:  
VIRGIN ORBIT, LLC, : **Proposed Hearing Date:**  
Defendant. : **July 28, 2023 at 10:30 a.m. (ET)**  
:  
----- x **Proposed Objection Deadline:**  
**At the Hearing**

**NOTICE OF MOTION**

**PLEASE TAKE NOTICE** that the above-captioned debtors and debtors in possession (the “**Debtors**”) have filed the *Joint Motion for Entry of an Order (I) Approving, on a Preliminary Basis, the Settlement Agreement and General Release of Claims with Vladimir Boyko, on Behalf of Himself and All Others Similarly Situated, (II) Certifying a Class of Claimants for Settlement Purposes Only, Appointing Class Counsel and a Class Representative, (III) Approving the Form and Manner of Notice to the Class Members of the Class Certification and Settlement, (IV) Scheduling a Fairness Hearing to Consider Final Approval of the Settlement, (V) Approving, on a Final Basis, the Settlement After the Fairness Hearing, and (VI) Granting Related Relief* (the “**Motion**”) with the United States Bankruptcy Court for the District of Delaware (the “**Court**”).

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<sup>1</sup> The Debtors in these cases, along with the last four digits of each debtor’s federal tax identification number, are: Virgin Orbit Holdings, Inc. (6914); Virgin Orbit National Systems, LLC (3801); Vieco USA, Inc. (0492); Virgin Orbit, LLC (9648); and JACM Holdings, Inc. (1445). The Debtors’ mailing address for purposes of these cases is 3880 McGowen Street, Long Beach, CA 90808.

**PLEASE TAKE FURTHER NOTICE THAT THE DEBTORS HAVE REQUESTED THAT THE COURT SCHEDULE A HEARING TO CONSIDER THE MOTION ON JULY 28, 2023 AT 10:30 A.M. (ET) BEFORE THE HONORABLE KAREN B. OWENS, IN THE UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF DELAWARE, 824 N. MARKET STREET, 6TH FLOOR, COURTROOM NO. 3, WILMINGTON, DELAWARE 19801.**

**PLEASE TAKE FURTHER NOTICE THAT THE DEBTORS HAVE REQUESTED THAT ANY OBJECTIONS OR RESPONSES TO THE RELIEF REQUESTED IN THE MOTION BE FILED BEFORE OR PRESENTED AT THE HEARING WITH THE UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF DELAWARE, 824 N. MARKET STREET, 3RD FLOOR, WILMINGTON, DELAWARE 19801.**

**PLEASE TAKE FURTHER NOTICE THAT IF NO OBJECTIONS OR RESPONSES TO THE MOTION ARE TIMELY FILED, SERVED, AND RECEIVED IN ACCORDANCE WITH THIS NOTICE, THE COURT MAY GRANT THE RELIEF REQUESTED IN CONNECTION WITH SUCH MOTION WITHOUT FURTHER NOTICE OR HEARING.**

*[Remainder of page intentionally left blank]*

Dated: July 24, 2023  
Wilmington, Delaware

**YOUNG CONAWAY STARGATT & TAYLOR, LLP**

/s/ Allison S. Mielke

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-and-

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*Counsel for Debtors and Debtors in Possession*